# **EXHIBIT A**

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November 4, 2015

## <u>VIA FEDERAL EXPRESS AND CERTIFIED U.S. MAIL, RETURN RECEIPT REQUESTED,</u> FOR P.O. BOX ADDRESSES

TO: ALL ADDRESSEES IN ATTACHMENT A

Re: Notice of Proposed Class Action Settlement in *Police & Fire Ret. Sys. of the City of Detroit v. Crane*, N.D. Cal., Case No. 13-cv-00945-VC.

Dear Sir/Madam:

Pursuant to 28 U.S.C. § 1715(b), you are hereby notified of a proposed settlement of the above-captioned class action lawsuit (the "Class Action") currently pending before the United States District Court for the Northern District of California ("the Court"). This notice is provided on behalf of all defendants in the Class Action. Enclosed herewith is a CD containing the documents referenced below.

(1) A copy of the complaint and any materials filed with the complaint and any amended complaints (28 U.S.C.  $\S$  1715 (b)(1));

The Class Action Complaint for Violations of the Federal Securities Laws filed March 1, 2013, Amended Class Action Complaint filed October 8, 2013, Second Amended Class Action Complaint filed June 25, 2014, Third Amended Class Action Complaint filed October 23, 2014, and all attachments thereto, filed in the Class Action are included on the enclosed CD in the folder labeled "Tab 1."

These documents, as well as all other documents referenced in this letter, are also available on the Internet via the federal government's Pacer service at <a href="https://ecf.cand.uscourts.gov/cgibin/login.pl">https://ecf.cand.uscourts.gov/cgibin/login.pl</a>. Additional information about Pacer may be found at <a href="http://pacer.psc.uscourts.gov">https://pacer.psc.uscourts.gov</a>.

(2) Notice of any scheduled judicial hearing in the class action (28 U.S.C. § 1715 (b)(2));

On October 30, 2015, Plaintiff in the Class Action filed a motion (the "Preliminary Approval Motion") requesting preliminary approval of the proposed settlement, approval of a proposed class notice, and the scheduling of a fairness hearing. The Court has scheduled a hearing on the Preliminary Approval Motion for December 10, 2015, at 10:00 am, at the San Francisco Courthouse, Courtroom 4 on the 17<sup>th</sup> Floor, 450 Golden Gate Avenue, San Francisco, California 94102. The notice of motion and the motion for preliminary approval are included on the enclosed CD in the folder labeled "Tab 2."

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- (3) Any proposed notification to class members of (a) the members' rights to request exclusion and (b) a proposed settlement of a class action (28 U.S.C. § 1715 (b)(3));
  - A proposed notice to class members, as well as a summary notice for publication, are included on the enclosed CD in the folder labeled "Tab 3."
- (4) Any proposed class action settlement (28 U.S.C. § 1715(b)(4));
  - The Stipulation of Settlement, and all attachments thereto, as filed with the Court on October 30, 2015, is included on the enclosed CD in the folder labeled "Tab 4."
- (5) Any settlement or other agreement contemporaneously made between class counsel and counsel for the defendants (28 U.S.C. § 1715(b)(5));
  - As reflected in paragraph 7.4 of the Stipulation of Settlement, the parties have entered into a confidential supplement agreement regarding requests for exclusion (the "Supplemental Agreement") which gives Defendants the right to terminate the settlement in the event that class members timely and validly requesting exclusion from the class meet the conditions set forth in the Supplemental Agreement. The parties have agreed not to file this Supplemental Agreement with the Court unless the Court requires it and to otherwise keep its terms confidential.
- (6) Any final judgment or notice of dismissal (28 U.S.C. § 1715(b)(6));
  - No final judgment or notice of dismissal has yet been entered. A proposed final judgment and order of dismissal, as filed with the Court on October 30, 2015, is included on the enclosed CD in the folder labeled "Tab 5."
- (7) (a) If feasible, the names of class members who reside in each State and the estimated proportionate share of the claims of such members to the entire settlement to that State's appropriate State official; or (b) if not feasible, a reasonable estimate of the number of class members residing in each State and the estimated proportionate share of the claims of such members to the entire settlement (28 U.S.C. § 1715 (b)(7));
  - Given the nature of the claims in the Class Action, it is not feasible to provide the names of class members who reside in each state, nor is it feasible to provide the estimated proportionate share of the claims of such members to the entire settlement.
- (8) Any written judicial opinion relating to the materials described under (3) through (6) above (28 U.S.C. § 1715(b)(8)).
  - No written judicial opinions exist relating to the settlement as of this date.

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Kindly acknowledge receipt of this notice by date-stamping the additional copy provided for that purpose and returning it in the self-addressed, postage-prepaid envelope also enclosed.

Very truly yours,

Mexis Shapino ISE

Alexis L. Shapiro

ashapiro@goodwinprocter.com GOODWIN PROCTER LLP

53 Exchange Place

Boston, Massachusetts 02109

Tel: (617) 570-1000 Fax: (617) 523-1231 Attorney for Defendants

Attachment and Enclosure

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### ATTACHMENT A: ADDRESSEES

#### Offices of Federal and State Officials:

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